

EXHIBIT 3-1

TAYLOR A. CATES DECLARATION

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

TENNESSEE STATE CONFERENCE OF
THE N.A.A.C.P., DEMOCRACY
NASHVILLE-DEMOCRATIC
COMMUNITIES, THE EQUITY ALLIANCE,
and THE ANDREW GOODMAN
FOUNDATION,

Plaintiffs,

v.

TRE HARGETT, in his official capacity as
Secretary of State of the State of Tennessee,
MARK GOINS, in his official capacity as
Coordinator of Elections for the State of
Tennessee, HERBERT SLATERY III, in his
official capacity as Attorney General of the
State of Tennessee, the STATE ELECTION
COMMISSION, and DONNA BARRETT,
JUDY BLACKBURN, GREG DUCKETT,
MIKE MCDONALD, JIMMY WALLACE,
TOM WHEELER, and KENT YOUNCE, in
their official capacities as members of the State
Election Commission,

Defendants.

Case No. 3:19-cv-00365
Judge Aleta A. Trauger

DECLARATION OF TAYLOR A. CATES

I, Taylor A. Cates, being of sound mind aware of 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct:

1. I am an attorney licensed to practice law in the State of Tennessee and am counsel of record for the plaintiffs. I am a member of the Memphis law firm of Burch, Porter & Johnson, PLLC. I submit this declaration in connection with Plaintiff's Petition for Fees.

2. I am a member of Burch, Porter & Johnson, PLLC and practice in the areas of commercial litigation, intellectual property, and products liability. I received a B.A. from the University of Virginia and a J.D. from Vanderbilt University.

3. William D. Irvine Jr. is an associate attorney at Burch, Porter & Johnson, PLLC and practices in the areas of commercial litigation, intellectual property, and products liability. He received a B.A., magna cum laude, from the University of Tennessee and a J.D. from Vanderbilt University. After graduation, he served as a law clerk to the Honorable Sheryl H. Lipman, United States District Judge for the Western District of Tennessee.


4. Our hourly rates are commensurate with the market rate for attorneys of similar qualifications and experience in Memphis.

5. I have personally reviewed the contemporaneous time records maintained by Burch, Porter & Johnson, PLLC in this matter. Burch, Porter & Johnson, PLLC utilizes a computer program to electronically maintain billing entries. These records are maintained in the ordinary course of the firm's business and are used on a monthly basis to generate client bills.

6. The time records attached hereto as Exhibit A are, to the best of my personal knowledge, a true and accurate reflection of the services Mr. Irvine and I rendered in this case, after removing certain entries for which we are not seeking reimbursement, even though such time might be recoverable.

7. I certify that all of the time and services reflected on the time record were reasonably necessary to provide my clients with effective representation in all phases of this case.

I declare, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, that the foregoing is true and correct. Executed this 21st day of December, 2020.



TAYLOR A. CATES, BPR No. 20006
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Exhibit A to Declaration of Taylor A. Cates

Burch Porter & Johnson Invoice
FILED UNDER SEAL